

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 2:20-cr-00054**

**NEDELTCHO VLADIMIROV**

**TENTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA  
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND  
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on March 16, 2020, and March 4, 2021, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Ninth Supplemental Response:**

In this case, the United States hereby incorporates by reference its prior discovery responses on March 30, 2020 (ECF 34), May 20, 2020 (ECF 38), August 24, 2020 (ECF 48), March 18, 2021 (ECF 70), April 30, 2021 (ECF 75), May 27, 2021 (ECF 76), June 25, 2021 (ECF 77), July 6, 2021 (ECF 95), July 15, 2021 (ECF 110), July 16, 2021 (ECF 110) and further supplements its responses as follows:

**Request H: Disclose to defendant all evidence favorable to defendant, including impeachment evidence, and allow defendant to inspect, copy or photograph such evidence.**

**Response:** The United States is unaware of any such evidence other than that which may otherwise be included herein and in its supplemental responses. As a precautionary measure, the United States discloses that the United States and witness Nicholas Martin entered into a limited use immunity agreement on July 17, 2021, a copy of which has been provided in discovery.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

UNITED STATES OF AMERICA

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s/Andrew J. Tessman  
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "TENTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY," has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 18th day of **July, 2021** to:

Timothy J. LaFon  
CICCARELLO DELGIUDICE & LAFON  
Suite 100  
1219 Virginia Street East  
Charleston, WV 25301-2912

By: s/ Andrew J. Tessman